

**Objection Deadline: July 10, 2015 at 4:00 p.m. (Prevailing Eastern Time)  
Hearing Date and Time: July 22, 2015 at 10:00 a.m. (Prevailing Eastern Time)**

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**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

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<b>In re</b>	:	<b>Chapter 11</b>
	:	
<b>LEHMAN BROTHERS HOLDINGS INC., et al.,</b>	:	<b>Case No. 08-13555 (SCC)</b>
	:	
<b>Debtors.</b>	:	<b>(Jointly Administered)</b>
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**HAIN CAPITAL HOLDINGS, LTD.'S  
JOINDER TO THE OBJECTION OF NEWPORT  
GLOBAL OPPORTUNITIES FUND L.P. AND NEWPORT  
GLOBAL CREDIT FUND (MASTER) L.P. TO THE MOTION OF  
PLAN ADMINISTRATOR PURSUANT TO SECTIONS 8.4, 9.3, AND 14.1  
OF THE MODIFIED THIRD AMENDED JOINT CHAPTER 11 PLAN OF  
LEHMAN BROTHERS HOLDINGS INC. AND ITS AFFILIATED DEBTORS  
TO ESTIMATE CLAIMS FOR RESERVE AND DISTRIBUTION PURPOSES**

Hain Capital Holdings, Ltd. ("Hain Capital"), by and through its undersigned counsel, hereby joins in (the "Joinder") the *Objection of Newport Global Opportunities Fund L.P. and Newport Global Credit Fund (Master) L.P. to the Motion of Plan Administrator Pursuant to Sections 8.4, 9.3, and 14.1 of the Modified Third Amended Joint Chapter 11 Plan of Lehman*

*Brothers Holdings Inc. and its Affiliated Debtors to Estimate Claims for Reserve and Distribution Purposes* [ECF No. 50258 ] (the “Objection”).<sup>1</sup>

The Hain Capital guarantee claim against LBHI that is subject to the Motion is Claim No. 13207 (the “Hain Guarantee Claim”). Hain Capital hereby joins in and incorporates by reference the legal arguments made in the Objection. Specifically, the Motion should be denied as to the Hain Guarantee Claim because Hain Capital has not recovered the full value of its claim entitlements, which are enforceable against LBHI under the LBHI Guarantees. Accordingly, Hain Capital respectfully requests that the Court deny the Motion as it relates to the Hain Guarantee Claim.

Dated: July 10, 2015  
New York, New York

**BROWN RUDNICK LLP**

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<sup>1</sup> Capitalized terms used but not otherwise defined in this Joinder shall have the meanings set forth in the Objection.